

## To: Air Pollution Control Board

I strongly oppose the coal powered utility proposed by Dominion Virginia Power for Wise county for the following reasons:

.The proposed plant's technology is already obsolete in light of the threat of global warming. It is now widely acknowledged that, given rapid climate change, U.S.'s coal will either have a 'clean coal' future or no future at all. Although it claims otherwise, Dominion proposed plant would not be "clean". An actual clean coal plant would have to have effective and financially feasible IGCC technology. This technology is still at the experimental stage and possibly decades off, and, even if perfected, it probably could not compete on the market with existing dirty coal plants without cap and trade policies and mandatory CO2 controls already in place. None of these conditions currently exists. The implications of this are recognized by several other state governments and sometimes even by utilities themselves. For an example of the latter, consider that PacifiCorp, which operates as Rocky Mountain Power in Wyoming, has decided to pull all coal-based power generation from its plan to meet increasing load demand within the six Western states it serves. "The situation the company finds itself in now is a significant amount of uncertainty about what climate change regulation might do to the cost of coal plants," admitted Rocky Mountain Power spokesperson Dave Eskelsen . "Coal projects are no longer viable." As for state rejection of proposed new coal plants: in the past two years, about a dozen states including Kansas, Texas, Florida and Oklahoma have turned down plans for 22 new coal-fired power plants, mostly because of growing public concerns about climate change. Even when no outright state rejection of proposed coal plants occurs, several states are requiring new coal plant proposals to take global warming into account in other ways. For instance, California, Oregon, Washington and other states are forcing utilities to consider the additional cost of curbing carbon dioxide emissions in proposed coal-based generation.

.In contrast, the only practical acknowledgement that Dominion itself gives of climate change concerns seems to be a plan to have a physical location 'carbon capturing technology', should such technology become available. This is completely inadequate and Dominion certainly does not deserve being awarded extra returns for being 'carbon capture compatible'. Far more important, though, the entire plant project should be disapproved just because the plant is not genuinely 'carbon capture compatible' as currently conceived.

.Even leaving aside CO2 emissions, the proposed plant would be unacceptably polluting. Especially significant to the Air Pollution Control Board is the fact that the Forest Service has notified the Department of Environmental Quality and Dominion that with its proposed unclean technology it would violate the Clean Air Act because the sulfur dioxide it would emit would endanger visibility and plant life in nearby wilderness.

.Many suspect that Dominion is rushing to build this plant before serious CO2 federal controls are enacted, expecting that it will be grandfathered in under the old CO2 emission-lenient laws. This same harmful strategy is being adopted by several utilities across the country. But, again, in some other states the utilities themselves already dismiss that this strategy is folly. Not only environmentalists but prudent utilities realize that any rush to build new traditional coal plants across the nation would threaten to overwhelm efforts to curb global warming and that in the end this threat would have to be countered. This means that plants like the one Dominion proposes, which have CO2 polluting technology and a potential longevity of up to 50 years, would have to be replaced or radically overhauled in a decade or so, at a huge cost to customers and taxpayers. Citizens anywhere would react angrily when faced later with the resulting rate hikes, which is why prudent utilities are asking whether it is a smart business practice to risk incurring the wrath of citizens and regulators when in the near future they discover that their "cheap coal" plants are too dirty to use as built and extremely expensive to make clean. The upshot is that in the long run Dominion's proposal may be unwise even for Dominion itself. Unquestionably, though, approving it would be unwise for Virginia.

.Meanwhile, even some "oil and coal states", such as New Mexico and Pennsylvania, already have vigorous programs promoting clean renewable energy and are successfully recruiting solar and wind power manufacturers from many countries, introducing new industrial jobs and cleaner energy into their economies in the process. Virginia, on the other hand, is now moving in the right direction with its new energy plan but is a relative newcomer to encouraging clean energy and is only beginning to seriously explore expanding energy efficiency in its utilities, as is attested to by our low national ranking in utility investments in efficiency. Approving Dominion's plant would be a step backwards in Virginia's energy policy. Let's learn from states like New Mexico and Pennsylvania and invest much more heavily in efficient, clean and renewable energy sources rather than waste more resources on environmentally harmful technologies which have no future.

.It is hard to see how it makes any sense to construct a new coal fired power plant with an already environmentally out-dated technology when global warming threatens, the technology for genuine "clean coal" is yet to be created, the cap-and-trade system and CO2 emissions regulations necessary to make clean coal technology economically feasible are yet to be legislated, the policy of later grandfathering in traditional CO2 emitting plants is yet to be prohibited, and we are only starting to implement a serious energy efficiency program with its potential for vast new economic opportunities.

I urge you to act in Virginia's public interest, and against the special interests of the coal utilities, by denying approval of Dominion's proposed plant. Future generations of Virginians will thank you for it.

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